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Exhibit 27

ATTORNEYS AT LAW 2715 HUNTINGTON AVE. NEWPORT NEWS, VIRGINIA 23607

> (757) 244-4611 FAX (757) 244-4631

ROBERT P QUADROS
RAYMOND B. BACON

June 2, 2009

Rex A. Davis, Clerk Newport News Circuit Court 2500 Washington Avenue Newport News, VA 23607

> RE: Jones, Blechman, Woltz & Kelly, P.C. v. Nikolai I. Sinkine Our File No. 177594,001

Dear Mr. Davis:

Enclosed please find original and two copies of a *Complaint for Contract Action*, which I request you file on behalf of the plaintiff in connection with the matter referenced above. Please forward the clerk's receipt to the office of the undersigned upon filing in the attached envelope.

By copy of this correspondence I am notifying Michael Wagner, our private process server, of the filing of the *Complaint for Contract Action* so that he may pick up the necessary paperwork for service upon the defendant upon completion of the filing of the *Complaint for Contract Action*.

I have enclosed the appropriate filing fee.

Thanking you in advance for your attention to this matter, I am

Very truly yours,

QUADROS & ASSOCIATES, P.C.

Robert P. Quadros

RPQ/sjp Enclosures

cc: Jones, Blechman, Woltz & Kelly, P.C. Michael Wagner
Nikolai I. Sinkine /

## VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF NEWPORT NEWS

Jones, Blechman, Woltz & Kelly, P.C.,

Plaintiff

Case No. 6L 0901007 V - 04

Nikolai I. Sinkine,

v.

Serve: Nikolai I. Sinkine

28 Kincaid Lane

Hampton, VA 23666

Defendant

PAPER CHASE
THIRD PARTY

PROCESS SERVICE

## **COMPLAINT FOR CONTRACT ACTION**

COMES NOW your Plaintiff, Jones, Blechman, Woltz & Kelly, P.C., by counsel, and for its Complaint for Contract Action against the Defendant, Nikolai I. Sinkine, doth state and affirm as follows:

- That your Plaintiff is a law firm doing business in the State of Virginia providing legal services, whose office is located in the City of Newport News, Virginia.
- 2. Bryan H. Schempf, Esquire, is a member and agent of Plaintiff corporation (hereinafter Schempf).
- That Schempf, as agent for Plaintiff, was retained by Defendant on January 10, 2006 to represent Defendant in a suit for divorce.
- 4. Through an oversight an Engagement Letter was not executed by Defendant at the onset of Plaintiff's representation. Subsequently, on January 5, 2007 Defendant executed an Agreement acknowledging his indebtedness at that time to Plaintiff and agreeing that the amount of indebtedness at that time and any future amount due for legal expenses and costs incurred were to be paid out of Defendant's share of the net equity from the sale of Defendant's marital home. A copy of the Agreement is attached hereto as Exhibit A.
- 5. Pursuant to Plaintiff's representation of Defendant in the divorce matter of *Nikolai I. Sinkine v.*Tatyana A. Babakaeva, Defendant incurred the total amount of \$31,140.88, due to Plaintiff.

6. On or about January 14, 2008 Schempf filed a *Notice of Attorney's Charging Lien* in the Circuit Court for the City of Hampton in connection with the legal fees and costs due by Defendant pursuant to Schempf's representation of Defendant in his suit for divorce. A copy of the *Notice of Attorney's Charging Lien* is attached hereto as Exhibit B.

7. Attached hereto as Exhibit C is an Affidavit executed by Schempf.

8. Defendant has failed and/or refused to remit to Plaintiff the amount due for Plaintiff's legal services provided to Defendant in the amount of \$31,140.88. A copy of Plaintiff's Billing Statement is attached hereto as Exhibit D.

WHEREFORE, Plaintiff, Jones, Blechman, Woltz & Kelly, P.C., prays that this Court award it judgment against Defendant, Nikolai I. Sinkine, in the principal sum of Thirty-one Thousand One Hundred Forty and 88/100 Dollars (\$31,140.88) with interest at the rate of 6.00% from September 6, 2007 until paid in full, together with court costs expended in this matter by reason of default in the payment for services rendered in Plaintiff's representation of Defendant, and for such other relief as this court deems just and equitable.

Jones, Blechman, Woltz & Kelly, P.C.

Of Counse

Robert P. Quadros, VSB # 14402 Raymond B. Bacon, VSB # 35376 Quadros & Associates, P.C. 2715 Huntington Avenue Newport News, VA 23607 (757) 244-4611 #177594.001

## **CERTIFICATE OF SERVICE**

I hereby certify that on the \_\_\_\_\_ day of June, 2009 a true and accurate copy of the foregoing pleading was mailed to:

Nikolai I. Sinkine 28 Kincaid Lane Hampton, VA 23666 Defendant

A copy will also be served on the defendant via a private process server.

Robert P. Quadros
Raymond B. Bacon
Quadros & Associates, P.C.
2715 Huntington Avenue
Newport News, VA 23607
(757) 244-4611